

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 19-10096 JCM
	:	
ERIC JON KUHN AND	:	HONORABLE JOHN C. MELARAGNO
TAMIKA ALLEN-KUHN,	:	
Debtors	:	CHAPTER 13
	:	
M&T BANK,	:	RELATED TO CLAIM #9
Movant,	:	
	:	
v.	:	
	:	
ERIC JON KUHN AND TAMIKA ALLEN-	:	
KUHN; and RONDA J. WINNECOUR,	:	
CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE
FILED IN COMPLIANCE WITH THE LOCAL RULES

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

THE QUINN LAW FIRM

BY: /s/ Michael S. Jan Janin
Michael S. Jan Janin, Esquire
PA Id. No. 38880
2222 West Grandview Boulevard
Erie, Pennsylvania 16506-4508
Telephone: 814-833-2222, Ext. 1045
Facsimile: 814-833-6753
E-Mail: mjanjanin@quinnfirm.com
Counsel for Debtors

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Debtors	:	CHAPTER 13
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M&T BANK,	:	RELATED TO CLAIM # 9
Movant,	:	
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	:	
ERIC JON KUHN AND TAMIKA ALLEN-	:	
KUHN; and RONDA J. WINNECOUR,	:	
CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

**CERTIFICATE OF SERVICE OF DECLARATION REGARDING
NOTICE OF MORTGAGE PAYMENT CHANGE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on October 31, 2024.

The type(s) of service made on the parties was Electronic Notification via the CM/ECF System.

- Office of the United States Trustee at ustpreion03.pi.ecf@usdoj.gov
- Ronda J. Winnecour at cmecf@chapter13trusteedpa.com
- Brian Nicholas, attorney for M&T Bank, at bnicholas@kmlawgroup.com
- Brent J. Lemon on behalf of Creditor M&T BANK at blemon@kmlawgroup.com

Dated: October 31, 2024

Respectfully submitted,

THE QUINN LAW FIRM

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E-Mail: mjanjanin@quinnfirm.com
Counsel for Debtors

1639667